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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

CASE NO: 21-cr-20439

HON. STEPHEN J. MURPHY

v.

VIOLATIONS: 18 U.S.C. § 922(g)(1)
18 U.S.C. § 844(a)

D-1 BRYON WARD,
D-2 JACK EDWARDS,

Defendant.

_____ /

SUPERSEDING INDICTMENT

FILED
CLERK'S OFFICE
AUG 11 2021
U.S. DISTRICT COURT
EASTERN MICHIGAN

THE GRAND JURY CHARGES:

COUNT ONE

(18 U.S.C. § 922(g)(1) — *Felon in Possession of a Firearm*)

D-1 BRYON WARD

On or about February 18, 2021, in the Eastern District of Michigan, the defendant, BRYON WARD, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, and knowing that he had been so convicted, did knowingly possess a firearm, that is, a loaded black Beretta Model: 9000 S, 9mm caliber pistol, which

had been shipped and transported in interstate and foreign commerce to reach this jurisdiction, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWO

(18 U.S.C. § 922(g)(1) — *Felon in Possession of a Firearm*)

D-2 JACK EDWARDS

On or about February 18, 2021, in the Eastern District of Michigan, the defendant, JACK EDWARDS, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, and knowing that he had been so convicted, did knowingly possess a firearm, that is, a loaded black Springfield Armory Model XDm Elite, 9mm caliber pistol, which had been shipped and transported in interstate and foreign commerce to reach this jurisdiction, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT THREE

(21 U.S.C. § 844(a) — *Possession of Cocaine Base*)

D-1 BRYON WARD

On or about February 18, 2021, in the Eastern District of Michigan, the defendant, BRYON WARD, did knowingly and intentionally possess a mixture and substance containing cocaine base, commonly known as

“crack cocaine,” a Schedule II narcotic controlled substance in violation of Title 21, United States Code, Section 844(a).

COUNT FOUR

(21 U.S.C. § 844(a) –*Possession of Cocaine Base*)

D-2 JACK EDWARDS

On or about February 18, 2021, in the Eastern District of Michigan, the defendant, JACK EDWARDS, did knowingly and intentionally possess a mixture and substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II narcotic controlled substance in violation of Title 21, United States Code, Section 844(a).

FORFEITURE ALLEGATIONS

(18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c))

The allegations contained in Counts One and Two of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c).

As a result of violating 18 U.S.C. § 922(g)(1) as set forth in this Indictment, upon conviction, the convicted defendant shall forfeit to the

United States any firearms and ammunition involved in or used in the knowing commission of the offenses.

THIS IS A TRUE BILL.

s/ Grand Jury Foreperson
Grand Jury Foreperson

SAIMA S. MOHSIN
Acting United States Attorney

BENJAMIN COATS
Chief, Major Crimes Unit

s/ Rosemary Wummel Gardey
ROSEMARY WUMMEL GARDEY
Assistant United States Attorney
211 West Fort Street, Suite 2001
Detroit, Michigan 48226-3220
phone: 313-226-0285
email: rosemary.gardey@usdoj.gov

Dated: August 11, 2021

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number 21-cr-20439
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <i>RWG</i>

Case Title: USA v. D-1 Bryon Ward and D-2 Jack Edwards

County where offense occurred : Washtenaw

Check One: ☒ Felony

☐ Misdemeanor

☐ Indictment/ ☐ Information --- no prior complaint.

☐ Indictment/ ☐ Information --- based upon prior complaint [Case number:]

☒ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

FILED
CLERK'S OFFICE
AUG 11 2021

U.S. DISTRICT COURT
EASTERN MICHIGAN

Superseding Case Information

Superseding to Case No: 21-cr-20439

Judge: Murphy

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☒ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
Bryon Ward	21 U.S.C. § 844(a)	
Jack Edwards	18 U.S.C. § 922(g)(1) 21 U.S.C. § 844(a)	

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

August 11, 2021

Date

Rosemary Wummel Gardey
 Rosemary Wummel Gardey
 Assistant United States Attorney
 211 W. Fort Street, Suite 2001
 Detroit, MI 48226-3277
 Phone: 313-226-0285
 Fax: 313-226-2372
 E-Mail address: rosemary.gardey@usdoj.gov
 Attorney Bar #: P49019

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.